

Exhibit A

Supplemental Declaration of Donna Armenta, Esq.

**SUPPLEMENTAL DECLARATION OF DONNA ARMENTA, ESQ.. IN SUPPORT
OF RICHLAND HOLDINGS, INC. DBA ACCTCORP OF SOUTHERN NEVADA'S
RENEWED MOTION FOR ATTORNEY FEES**

Donna Armenta, Esq. declares, pursuant to 28 U.S.C. § 1746 and NRS § 53.045, under penalty of perjury, that the following is true and correct:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am an attorney with Donna Armenta Law, counsel for Defendant Richland Holdings, Inc. d/b/a AcctCorp of Southern Nevada ("Richland") in the cases styled *Richland Holdings, Inc. v. Ahmed*, Case No. 19C003650, in the Las Vegas Justice Court (the "Ahmed Collection Action"), and *Richland Holdings, Inc. v. Munoz*, Case No. 19C009523, originally in the Las Vegas Justice Court and subsequently transferred to the Eighth Judicial District Court of Nevada as Case No. A-20-821637-C (the "Munoz Collection Action").

3. I make this Supplemental Declaration in support of Richland's Renewed Motion for Attorneys' Fees ("Renewed Motion") in this action.

THE AHMED COLLECTION ACTION

4. On January 30, 2019, Richland filed the Ahmed Collection Action for breach of contract and monies due and owing.

5. The Justice Court granted Richland's motion to dismiss on or about July 11, 2019, and dismissed Mr. Ahmed's counterclaim, which he ultimately brought before this Court on October 31, 2019.

6. Thus, Richland, as RCW's assignee, has been forced to incur attorney's fees in defending this frivolous action in conjunction with collection efforts on Mr. Ahmed's debt to RCW.

7. Richland and Mr. Ahmed proceeded to litigate the state court collection action, and on November 3, 2020, the justice court granted Richland's motion for summary judgment.

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1 none of which the justice court had jurisdiction, ultimately resulting in a transfer of the entire
2 case to the Eighth Judicial District Court of Nevada.

3 17. A true and accurate copy of the Order Granting Motion to Transfer is attached to
4 the Renewed Motion as **Exhibit C**.

5 18. Eventually, on March 4, 2021, the state district court granted Richland's and
6 RCW's respective motions for summary judgment and denied Ms. Munoz's countermotion for
7 summary judgment, deciding that case completely in favor of Richland and RCW, although the
8 order has not yet been finalized.

9 19. A true and accurate copy of the hearing minutes from the March 4, 2021 hearing
10 on the numerous motions for summary judgment is attached to the Renewed Motion as
11 **Exhibit D**.

12 Dated this 12th day of March, 2021.

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14 Donna Armenta, Esq.
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MARQUIS AURBACH COFFING

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